

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN, :  
Plaintiff, :  
V. : No. 2:18-cv-01107  
CITY OF PHILADELPHIA, ET AL, :  
Defendants. :  
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\_\_\_\_\_

**PLAINTIFF'S SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS  
ADDRESSED TO DEFENDANT THE CITY OF PHILADELPHIA**

Pursuant to Federal Rule of Civil Procedure 34, Plaintiff propounds the following Supplemental Request for Production of Documents to be answered within the thirty days of service:

**I. DEFINITIONS**

1. "You" means Defendants and anyone acting on their behalf.
2. "Document" shall have the same definition as set forth in the Federal Rules of Civil Procedure.

**II. DOCUMENTS REQUESTED**

Supplemental Request for Production of Documents based on Warden Lawton's January 14, 2020 deposition:

1. Any and all lieutenant and/or captain prison statements and/or investigation reports for any and all suicide deaths at the Philadelphia House of Correction for the last eight years, including, but not limited to, inmate Gene Wilson.
2. Copies of any and/or all tape recorded statements from meetings and/or "debriefings" held at Warden Lawton's offices for all prison deaths and/or suicide deaths from 2010 to 2018 at the House of Corrections.

3. Copies of any and all transcribed statements from meetings held at Warden Lawton's offices for all prison deaths and/or suicide deaths and/or prison sentinel events from 2010 to 2018 at the House of Corrections.

4. Copies of any and all signed investigative statements, reports and the like signed by Warden Lawton for all prison suicide deaths during his tenure as Warden at the Philadelphia House of Corrections from 2010 to 2018.

5. Any and all prison suicide reports, correspondence, emails and the like pertaining to Gene Wilson and other prison suicide prisoners for the last eight years which either is, or, in the alternative, was in the possession of one Katrina Lewis.

6. Copies of any and all signed investigative statements, reports and the like signed by Warden Lawton for all prison suicide deaths during his tenure as Warden at the Philadelphia House of Corrections from 2010 to 2018 that were transferred or delivered to the Deputy Commissioner and/or Deputy Commissioner of Operations of the Philadelphia Prison System.

7. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to any and all deaths at the House of Corrections during this time period.

8. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to any and all prison suicide deaths at the House of Corrections during this time period.

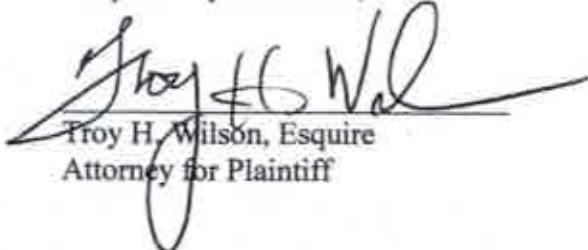
9. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to the prison suicide death of Gene Wilson at the House of Corrections during this time period.

10. Copy of the Self Injury Prevention Program policy.

11. Provide a copy of the specific written rule, regulation or policy (along with policy number) for inmates transferred from ASD to HOC?

12. Copies of any and/or all of the prison social worker written reports during their tours of duty at the House of Corrections on March 26, 2016.

Respectfully submitted,



Troy H. Wilson, Esquire  
Attorney for Plaintiff